

**Exhibit B**

**Proposed Notice**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 15  
 :  
 : Case No. 22-\_\_\_\_\_( )  
FTX DIGITAL MARKETS LTD. (in :  
Provisional Liquidation) :  
 :  
 :  
Debtor in a :  
Foreign :  
Proceeding.<sup>1</sup> :  
 :  
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**NOTICE OF FILING AND HEARING ON PETITION SEEKING  
RECOGNITION OF FOREIGN INSOLVENCY PROCEEDING  
PURSUANT TO CHAPTER 15 OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE** that on November 15, 2022, Brian C. Simms, Kevin G Cambridge, and Peter Greaves ( “**Joint Provisional Liquidators**”), in their capacities as the duly appointed joint provisional liquidators and foreign representatives of FTX Digital Markets Ltd. (“**FTX Digital**” or the “**Debtor**”), the Debtor in the above-captioned chapter 15 proceeding with respect to a provisional liquidation in the Commonwealth of The Bahamas (the “**Bahamian Liquidation**”) pursuant to the Companies (Winding Up Amendment) Act, 2011 (the “**CWUA Act**”), filed the Official Form Petition and *Verified Petition for Recognition of Foreign Insolvency Proceedings and Related Relief* (the “**Verified Petition**,” and, together with the Official Form Petition, the “**Petition**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) under chapter 15 of title 11 of the United States Code (as amended, the “**Bankruptcy Code**”) seeking recognition of the Bahamian Liquidation as a foreign main proceeding.

**PLEASE TAKE FURTHER NOTICE** that a hearing has been scheduled before the Honorable \_\_\_\_\_ at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004-1408, in Courtroom \_\_\_\_\_, for \_\_\_\_\_, 2022, at \_\_:\_\_\_.m. (ET) to consider the Petition (the “**Recognition Hearing**”).

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Petition must be made in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules for the Southern District of New York, in writing describing the basis therefor, filed with the Office of the Clerk of the Court, One Bowling Green, New York, NY 10004-1408, and served upon counsel for the Joint Provisional Liquidators so as to be received by \_\_\_\_\_, 2022. Notices to counsel for the Joint Provisional

<sup>1</sup> FTX Digital Markets Ltd. (in Provisional Liquidation) was incorporated in the Commonwealth of The Bahamas as an International Business Company, registered number 207269B.

Liquidators should be addressed to **Warren E. Gluck, Esq.**, Holland & Knight LLP, 31 West 52nd Street, New York, NY 10019.

**PLEASE TAKE FURTHER NOTICE** that if no response is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested in the Petition without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that at the Recognition Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of this case.

**PLEASE TAKE FURTHER NOTICE** that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court at such hearings of the adjourned date or dates or any adjourned hearing.

**PLEASE TAKE FURTHER NOTICE** that no time period or place for the filing of proofs of claim has been established and creditors need not file proofs of claim at this time.

**PLEASE TAKE FURTHER NOTICE** that copies of the Petitions and other filings in these cases are presently available (1) on the Bankruptcy Court's Electronic Case Filing System, which can be accessed from the Bankruptcy Court's website at <https://ecf.nysb.uscourts.gov> (a PACER login and a password are required to retrieve a document); and/or (2) upon written request to the Joint Provisional Liquidators' counsel addressed to:

Holland & Knight LLP  
31 West 52nd Street  
New York, New York 10019  
Telephone: (212) 513-3200  
Facsimile: (212) 385-9010  
Attention: Warren E. Gluck, Esq.  
[Warren.Gluck@hklaw.com](mailto:Warren.Gluck@hklaw.com)

Dated: November 15, 2022  
New York, New York

HOLLAND & KNIGHT LLP

/s/ Warren E. Gluck

Warren E. Gluck, Esq.

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